

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Peter D'Amico
Title: Senior Manager

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-1 Please provide any and all studies, estimates, or calculations, that Verizon and/or its witnesses have undertaken with respect to the transport costs to be incurred by Verizon related to:

- a) Global NAPs' single POI interconnection proposal;
- b) Verizon Massachusetts's "GRIPS" or "VGRIPS" proposal.

REPLY:

- 1. Verizon MA objects to these Requests to the extent that the definitions and instructions used by GNAPs in its Requests do not comply with, or go beyond, the applicable Commission procedural rules and practices.
- 2. Verizon MA objects to these Requests to the extent that they purport to call for the production, identification, or disclosure of information or documents protected by the attorney-client or other privileges, information or documents protected by the work-product doctrine, or information or documents protected as trial preparation material.

a-b) Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and competitively sensitive business information.

Subject to and without waiving the general objections set forth above, Verizon MA states:

REPLY: GN-VZ 1-1
(cont'd)

Verizon MA does not possess any studies, estimates, or calculations specific to the proposals described above.

VZ # 1

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Peter D'Amico
Title: Senior Manager

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-2 Please provide any and all studies, estimates, or calculations, that Verizon and/or its witnesses have undertaken with respect to Verizon's estimate of the transport costs to be incurred by Global NAPs related to:

- a) Global NAPs' single POI interconnection proposal;
- b) Verizon Massachusetts's "GRIPS" or "VGRIPS" proposal.

REPLY: Verizon MA incorporates by reference the general objections set forth in response to GNAPs 1-1 above. Subject to and without waiving these objections, Verizon MA states:

Verizon MA does not possess any studies, estimates, or calculations specific to the proposals described above.

VZ # 2

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Peter D'Amico
Title: Senior Manager

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-3 Please indicate what rate Verizon Massachusetts proposes to charge Global NAPs for transport outside Verizon Massachusetts's local calling areas under its VGRIPs proposal and provide a citation to the most recent applicable tariff(s), including page numbers and effective dates.

REPLY: Verizon MA incorporates by reference the general objections set forth in response to GNAPs 1-1 above.

Without waiving these objections, Verizon MA responds to this request as follows:

Verizon MA is not proposing VGRIPS in Massachusetts nor is it proposing to charge Global NAPs for transport outside of the Verizon MA's local calling area.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Peter D'Amico
Title: Senior Manager

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-4 Please indicate the cost(s) for each of the charges listed in response to interrogatory 3 (above).

REPLY: Verizon MA incorporates by reference the general objections set forth in response to GNAPs 1-1 above.

Verizon MA further objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and competitively sensitive business information.

Without waiving these objections, Verizon MA responds to this request as follows:

Verizon MA is not proposing GRIPS or VGRIPS in Massachusetts nor is it proposing to charge Global NAPs for transport outside of the Verizon MA's local calling area.

VZ # 4

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Peter D'Amico
Title: Senior Manager

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-5 Does Verizon Massachusetts propose to charge Global NAPs just for the incremental transport distance, between the local calling area boundary and the POI/IP, or to charge Global NAPs for the entire distance between the Global NAPs POI and the IP, *including* the transport that Verizon Massachusetts undertakes within the local calling area?

REPLY: Verizon MA incorporates by reference the general objections set forth in response to GNAPs 1-1 above.

Without waiving these objections, Verizon MA responds to this request as follows:

Verizon MA is not proposing GRIPS or VGRIPS in Massachusetts nor is it proposing to charge Global NAPs for transport outside of the Verizon MA's local calling area.

VZ # 5

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Peter D'Amico
Title: Senior Manager

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-6 With respect to the rate Verizon Massachusetts proposes to bill Global NAPs for transport, provide the methodology used and provide all supporting documentation used to determine the costs and develop the transport rates.

REPLY: Verizon MA incorporates by reference the general objections set forth in response to GNAPs 1-1 above.

Verizon MA further objects to this request on the grounds that the request is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of confidential and competitively sensitive business information.

Verizon MA further objects on the ground that this request seeks information that is immaterial and irrelevant, and is not reasonably calculated to lead to the discovery of admissible evidence. Verizon's MA's transport rates are not in dispute in this case.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Peter D'Amico
Title: Senior Manager

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-7 Please indicate when the transport charges identified in response to Question 3 were developed and, if and when approved by the Commission of Public Utilities of Massachusetts ("Commission").

REPLY: Verizon MA incorporates by reference the general objections set forth in response to GNAPs 1-1 above.

Without waiving these objections, Verizon MA responds to this request as follows:

Verizon MA is not proposing GRIPS or VGRIPS in Massachusetts nor is it proposing to charge Global NAPs for transport outside of the Verizon MA's local calling area.

**Verizon New England Inc.
D/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Peter D'Amico
Title: Senior Manager

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-8 Please indicate the date the last Verizon Massachusetts UNE transport rates were set and identify the relevant proceeding by docket or case number.

REPLY: Verizon MA incorporates by reference the general objections set forth in response to GNAPs 1-1 above.

Verizon MA further objects to this request on the grounds that the request is overly broad, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of highly sensitive material. Verizon MA's transport rates and costs are not in dispute in this proceeding.

Without waiving its objections, Verizon MA responds as follows:

UNE transport costs were initially established as part of Verizon MA's revised compliance filing dated February 14, 1997 in Phase 4-B of the *Consolidated Arbitrations* docket, and approved by the Department on May 2, 1997. Verizon MA filed its comprehensive DTE 17 tariff on September 27, 1999 that included rates for UNEs, interconnection and collocation. The tariff was subsequently approved by the Department on March 24, 2000.

New transport rates will be established in Docket 01-20. Verizon MA will be filing revised cost studies and tariff pages in compliance with the Department's initial order dated July 11, 2002 and any subsequent order addressing the pending multiple Motions for Reconsideration. These cost studies will include revised rates for all UNEs, interconnection, and collocation.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Terry Haynes
Title: Manager

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-9 Does Verizon Massachusetts provide any form of a single number service arrangement to Verizon Online? If the answer is yes, provide the tariff(s), pricing guides, or contracts under which all such arrangements are supplied by Verizon Massachusetts. If any responsive information such as the tariffs are publicly available, you may provide a specific reference to that material (*e.g.*, tariff name, section number, and effective date) rather than a physical copy.

REPLY: Verizon MA incorporates by reference the general objections set forth in response to GNAPs 1-1 above.

Verizon MA further objects to this request on the grounds that the request is overly broad, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of competitively sensitive business information.

Without waiving and specifically reserving these objections, Verizon MA responds to this request as follows:

Verizon MA provides a single number service arrangement to Verizon Online in its IPRS Tariff offering as outlined in FCC #11, Section 17.5, effective April 28, 2001.

**Verizon New England Inc.
D/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Terry Haynes
Title: Manager

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-10 For each service identified in response to Question 9, please provide Verizon Massachusetts's costs for all transport performed by Verizon Massachusetts in connection with providing the service. Provide all such data, where available, on:

- a) A per-line basis;
- b) A per-minute basis; and
- c) A per-mile basis.

REPLY: a-c) Verizon MA incorporates by reference the general objections set forth in response to GNAPs 1-1 above.

Verizon MA further objects to this request on the grounds that the request is overly broad, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of competitively sensitive business information. Verizon MA's transport rates and costs are not in dispute in this proceeding. IPRS is offered pursuant to a Federal tariff and as such is not within the state jurisdiction.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Victor DeSantis
Title: Director

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-11 Provide Verizon Massachusetts's most recent cost studies for all forms of unbundled interoffice transport for which a tariff or SGAT has been approved by the Commission.

REPLY: Verizon MA incorporates by reference the general objections set forth in response to GNAPs 1-1 above.

Verizon MA further objects to this request on the grounds that the request is overly broad, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of competitive sensitive business information. Verizon MA's transport rates and costs are not in dispute in this proceeding.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Terry Haynes
Title: Manager

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-12 Is Verizon Massachusetts aware of any technical limitation that would prevent Verizon Massachusetts from providing a single number service arrangement to ISPs or other customers in Massachusetts? If the answer is yes, provide all documents, including network planning and engineering documents, that Verizon Massachusetts relies upon to support that claim.

REPLY: Verizon MA incorporates by reference the general objections set forth in response to GNAPs 1-1 above.

Subject to and without waiving these objections, Verizon MA states:

Verizon MA is not presently aware of any technical limitation that would prevent Verizon MA from providing a single number service arrangement to ISPs or other customers in Massachusetts.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Terry Haynes
Title: Manager

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-13 Does Verizon Massachusetts offer single number service arrangements in Massachusetts or plan to offer such a service in Massachusetts within the time period covered by the interconnection agreement that is at issue in this arbitration? If the answer is yes, please provide the following:

- a) Identify all hubbing points, by LATA name, wire center name and Common Language Location Identifier (CLLI) code, that are used to provide single-number service in Massachusetts. If any hubbing points are located in the Massachusetts LATA, explain why they are not listed in Verizon Telephone Companies Tariff FCC No. 1, Section 16.5.3 (IPRS Terms and Conditions).
- b) Describe with specificity the manner in which single number arrangement calls are routed through the Verizon Massachusetts network and delivered to the Internet gateway point(s).
- c) Provide all cost studies and/or other support indicating that access charges are being paid for calls that pass between Verizon's defined local calling areas.

REPLY: Verizon MA incorporates by reference the general objections set forth in response to GNAPs 1-1 above.

Subject to and without waiving these objections, Verizon MA states:

- a) The FCC No. 11, section 17.5 contains a list of the hubbing points in Massachusetts.

- REPLY:** GN-VZ 1-13 (cont'd)
- b) With IPRS service, a Verizon end user dials a number to connect to the internet service provider (ISP) who subscribes to the IPRS service. The call is routed through the end users' local Verizon central office and then connected to a Verizon IPRS hub. At the IPRS hub the call is handed off to the ISP via a dedicated link separately purchased by the ISP. With PRI Hub service, a Verizon end user dials a 1-500 number to connect to the ISP. The call is routed through the end users' local switch to either a sector hub or an interconnection hub and then handed off to the ISP via a dedicated link separately purchased by the ISP.
- c) Verizon MA objects to this request on the grounds that the request is overly broad, not reasonably calculated to lead to the discovery of admissible evidence, and seeks the disclosure of competitively sensitive business information. Verizon MA's transport rates and costs are not in dispute in this proceeding. Verizon MA offers IPRS under a Federal tariff, and as such is not within the state jurisdiction.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Terry Haynes
Title: Manager

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-14 With respect to the deployment of voice over packet switching in Massachusetts, please indicate if there are any differences to customers as a result of such deployment, including any differences in toll or other charges.

REPLY: Verizon MA incorporates by reference the general objections set forth in response to GNAPs 1-1 above.

Verizon MA also objects on the ground that this request seeks information that is immaterial and irrelevant, and is not reasonably calculated to lead to the discovery of admissible evidence. There is no issue concerning the deployment of packet-switching technology in Massachusetts.

In addition, the request is overly broad, vague, unclear, and not subject to meaningful response. It is unclear what is meant by "voice over packet switching." It is also unclear to which customers GNAPs is referring. Finally, the term "differences" is extremely broad and would require speculation to determine what might constitute "differences to customers" and whether such differences are meaningful.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Terry Haynes
Title: Manager

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-15 Please indicate whether such implementation will increase or decrease costs and provide any and all cost studies or financial impact studies supporting such assertion.

REPLY: Verizon MA incorporates by reference the general objections set forth in response to GNAPs 1-1 above.

Verizon MA further objects on the ground that this request seeks information that is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, and unduly vague. There is no issue concerning the deployment of packet-switching technology in Massachusetts, and the costs of any services based on packet-switching technology are irrelevant to this case.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Terry Haynes
Title: Manager

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-16 Please indicate the price(s) for transport in Verizon Massachusetts's territory charged to CLECs and the availability of same between:

- a) all local exchange calling areas defined by Verizon in Massachusetts.
- b) If Verizon Massachusetts alleges that non-Commission approved transport rates should be applied to Global NAPs, indicate the rationale for such application and the cost support for such alleged charges.

REPLY: Verizon MA incorporates by reference the general objections set forth in response to GNAPs 1-1 above.

Verizon MA objects on the ground that this request seeks information that is immaterial and irrelevant, and is not reasonably calculated to lead to the discovery of admissible evidence. Verizon MA's transport rates and costs are not in dispute in this proceeding.

Verizon MA further objects to this subpart on the ground that it is overly broad and unduly burdensome. Determining the "availability" of transport between all local exchange calling areas cannot be undertaken in any reasonably accessible manner. To compile that information would require a burdensome and expensive special study.

Subject to and without waiving these objections, Verizon MA states:

- a) The rates for transport are contained in the CLEC's interconnection agreement and applicable tariffs. The application of rates and charges for unbundled IOF Transport is described in DTE No.17,

REPLY: GN-VZ 1-16
(cont'd)

Part B, Section 2.2. The dedicated transport monthly rates are located in DTE No.17 Part M, Section 2.2.1. As stated in the tariff (DTE No.17, Part B, Section 2.1.1.A), unbundled dedicated IOF transport is offered subject to availability and Verizon is not required to construct new IOF transport facilities to meet specific CLEC point-to-point demand for facilities that Verizon has not deployed for its own use. Where facilities do not exist, a CLEC can order Special Access service from DTE No.15, Section 7.

- b) Verizon MA has offered under the interconnection agreement to provide transport at established Massachusetts UNE rates.

VZ # 16

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Terry Haynes
Title: Manager

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-17 Does Verizon Massachusetts believe that Verizon's IPRS or PRI-SNS 500-number service offerings (including Internet Protocol Routing Service as offered in Verizon Telephone Companies Tariff FCC No. 1 (Access), Section 16.5) are priced so as to provide "additional compensation for the long-distance handling" of traffic transported outside of the local calling area, before it reaches the IPRS hub? If the answer is yes, provide all evidence that Verizon Massachusetts relies upon to support that claim.

REPLY: Verizon MA incorporates by reference the general objections set forth in response to GNAPs 1-1 above.

Verizon MA further objects on the ground that this request seeks information that is immaterial and irrelevant, and is not reasonably calculated to lead to the discovery of admissible evidence. The pricing of Verizon MA's Federally tariffed services is not at issue in this proceeding.

In addition, the request is overly broad, vague, unclear, and not subject to meaningful response. It is unclear what is meant by "additional compensation for the long-distance handling" of traffic transported outside of the local calling area, before it reaches the IPRS hub."

Subject to and without waiving these objections, Verizon MA states:

Verizon does believe that IPRS service is priced to provide additional compensation for IPRS traffic that is non-local in nature.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-45

Respondent: Terry Haynes
Title: Manager

REQUEST: Global Naps, Inc., Set #1

DATED: September 16, 2002

ITEM: GN-VZ 1-18 Does Verizon Massachusetts ever provide service to a customer where the NPA-NXX code is assigned to a rate center that differs from the rate center in which the service is physically terminated, by a means other than through the use of a leased channel dedicated specifically and solely to that customer? If the response is in the affirmative, describe the manner in which such service is physically provided and identify all charges that would apply for such a serving arrangement.

REPLY: Verizon MA incorporates by reference the general objections set forth in response to GNAPs 1-1 above.

Subject to and without waiving these objections, Verizon MA states:

Verizon offers the following services in Massachusetts that are consistent with the description provided: Remote Call Forwarding (RCF), Enhanced ISDN PRI Hub Service and Internet Protocol Routing Service (IPRS).

Remote Call Forwarding service provides automatic forwarding of all incoming calls placed to a seven digit Remote Call Forwarding to a terminating telephone number in the same or a different exchange. RCF is offered both in DTE MA No.10 and No.17. The monthly rate is \$16.97 (DTE No.10) and \$6.96 (DTE No.17). In addition, the RCF customer pays the applicable usage charges.

Enhanced ISDN PRI hub service is a Telephone Company designed LATA-wide data network service which provides end user single number dial-up access to the customer data location. The service

REPLY: GN-VZ 1-18 utilizes strategically located single number hub end offices to collect and route data traffic to predetermined points of interconnection from which the traffic is routed to the customer location over dedicated facilities. Enhanced ISDN PRI hub service is offered in DTE MA No.10 for a monthly rate of \$525 (month-to-month).

Internet Protocol Routing Service (IPRS) provides for the collection, concentration and management of the customer's data traffic within a LATA. IPRS consists of network routers located at LATA hub sites that will collect the customer's end user data traffic and concentrate it for connection and transport over the Telephone Company's fast packet data network to a customer's designated location. IPRS is offered in Tariff F.C.C. No.11 for a monthly rate of \$56.00 (dial-up port, month-to-month).

VZ # 18